Before the Federal Communications Commission Washington, D.C. 20554

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In the Matter of)
Amendment of Parts 2 and 97 of the Commission's Rules to Create a Low) ET Docket No. 02-98
Frequency Allocation for the Amateur Service By Mark W. Kahrs, PhD.) RM - 9404)
To: Chief, Public Safety and Private Wireless Branch Wireless Telecommunications Bureau)))

REPLY TO COMMENTS

Utility Suppliers have been obstreperous in their objection to opening the 2200 meter band to Amateurs. Unfortunately, their argumentation is based on hysteria and not scientific reason.

First, they completely fail to provide measurements or data on interference. None of the dissenters provide receiver sensitivity measurements or interference measurements on existing PLC receivers.

Second, they seem to admit that the system is insecure which as several commenters have remarked can no longer be tolerated in a post 9-11 society. If this is true, then now is the time for the utilities to upgrade to systems with Error Correction and encryption.

Third, many of the utitity respondants seem to be weefully ignorant of the realities of LF transmission, particularly the efficiency of small antennas over a non-conductive surface.

The IEEE committee representative also fails to present concrete data concerning interference. To quote:

"A study of modulated interference and PLC receiver characteristics have not been presented. Previous studies relating GWEN and PLC are not directly extensible to amateur radio and PLC."

He decries the lack of data and doesn't provide data to substantiate his fears. While he dismisses the ARRL response as lacking data, he is exactly guilty of the same offense.

Further, the representative also demands that the ARRL and AMRAD provide penalties for interference when such penalties are clearly spelled out in the FCC regulations.

Finally, there is the question of impact. One of the purposes for the Amateur Service is to increase the scientific and engineering capabilities of the nation. And so, trying to quantify how many amateurs would benefit is not the issue — the issue is whether scientific and engineering knowledge would increase in this very interesting band. And how could it not?

In conclusion, reason should prevail over hysterical braying.

Respectfully submitted,

(Professor) Mark Kahrs, PhD. Amateur License KB2VSQ 5639 Bartlett Street Pittsburgh, PA 15217